

# Gifts Policy

## Policy Details

### Policy Owner

Chief Risk Officer

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2 February 2024

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2 January 2024

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2 January 2025

### Approved by

Scott Saunders

## Document Control

### Version

5.1

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Version	Amended by	Reason for change	Details of changes	Date
1.0	Group Compliance	Original issue	N/A	1 March 2018
2.0	Group Compliance	Minor enhancements	N/A	1 June 2019
3.0	Group Compliance	Minor enhancements	N/A	29 June 2021
4.0	Group Compliance	Change in Whistleblower process	Whistleblower Service contact information updated	22 February 2023
5.0	Scott Saunders - Group Compliance	Policy reviewed as part of remediation plan	Policy transferred to new template  Update to allow exemptions to accepting gifts above \$250 with appropriate approvals	02 January 2024
5.1	Compliance	Update legislation	Update to relevant legislation section to include Qld CCA	13 February 2024

## **01 Purpose and Scope**

In accordance with the Code of Conduct guiding principles, The Star Entertainment Group (TSEG) is committed to conducting business in a manner which is ethical, professional and compliant with our legal obligations.

The Gifts Policy supports the Code of Conduct by setting out what team members should do if they receive or are offered a gift in connection with performing their duties at TSEG.

This policy should be read in conjunction with the Anti-Bribery and Corruption Policy and the Conflicts of Interest Policy.

For details regarding entertainment and hospitality expenditure for business partners, the Travel, Entertainment and Expenses Policy should be consulted.

This Policy applies to all TSEG Directors, Executives, Team Members, Contractors at all TSEG locations.

## **02 Gifts to Team Members**

When team members receive gifts from guests, business partners or suppliers the following guiding principles should be followed:

Guiding Principle	Description
<b>Avoid Conflicts of Interest</b>	Receipt of a gift should not influence a team member in making decisions as part of their duties at TSEG. Consideration should always be given to whether accepting a gift is an actual or potential conflict of interest or if it could be perceived as one.
<b>Observe Applicable Laws</b>	All laws prohibiting the solicitation or acceptance of gifts or benefits by certain team members must be abided by at all times.
<b>Be Transparent</b>	Any gift received must have the appropriate approvals prior to acceptance and be declared on the gifts register.

### **2.1 Types of Gifts**

2.1.1 A gift is any gratuity, consideration or other benefit provided to a team member and/or a member of a team member’s family, but not limited to:

- Cash
- A tangible item of value
- A service of value
- Gift vouchers
- Free or discounted travel or accommodation
- Hospitality – a meal, accommodation or experience of value not related to a work function
- Any favour, promise or undertaking that will benefit the team member and/or a member of the team member’s family.

- 2.1.2 For the purposes of this policy, a gift does **NOT** include a tip or gratuity:
- Provided to a team member who does not hold a gaming license; and
  - Received from a guest for hospitality services received at TSEG bars, restaurants or hotels; and
  - Where the amount of the tip or gratuity is reasonable having regard to the hospitality services provided and in line with usual custom and practice.
- 2.1.3 Where a team member is unsure if they can accept a gift, tip or gratuity they should consult their manager before accepting it.

## 2.2 All Team Members

- 2.2.1 Team members should always be aware that accepting a gift has the potential to create a conflict between the personal interests of the team member and TSEG's commercial and reputational interests. This may compromise the integrity of both the team member and TSEG.
- 2.2.2 All team members must:
- **Never ask for a gift** from any person in connection with their work at TSEG
  - **Report all gifts received or offered** in connection with the performance of their employment duties, regardless of value. Gifts must be reported on the gift register of the property where it was received. Gift registers are available in Protecht.

## 2.3 Gifts from Guests

- 2.3.1 **Licensed team members** are not permitted to accept any gifts from any guest at TSEG. This is a condition of their licence and has serious consequences if breached.
- 2.3.2 If a licensed team member is offered a gift by a guest they must make every effort to refuse it. In circumstances where, for cultural or other reasons, this may not be practicable, the gift should be reported in the gifts register and the gift must be handed to the Compliance Team at the property where they are employed.
- 2.3.3 **Unlicensed team members** may accept and retain a gift or gifts from a person in connection with their employment at TSEG if:
- The value of the gift does not exceed \$250. When receiving multiple gifts from the same person the aggregated value must not exceed \$250 in a 12-month period
  - The gift is reported in the gifts register
  - The gift does not compromise and would not objectively be viewed as compromising the team members independence and judgement in connection with any decision affecting TSEG's business relationship with the giver of the gift.
- 2.3.4 Where a gift exceeds \$250 it must be approved by a General Manager or above from the team member's department. For General Managers or above approval must be obtained from the Group Chief Risk Officer.

## 2.4 Gifts from Business Partners or Suppliers

- 2.4.1 All team members may accept gifts or hospitality from current or potential business partners or suppliers provided the following apply:
- The gift must not be in the form of cash or cash equivalents, such as gift cards
  - If the gift is in the form of a discount, the business partner or supplier must only provide discounts available to all TSEG team members
  - The gift or hospitality could not be reasonably interpreted as a bribe to secure business
  - The gift or hospitality must not be offered or accepted during tender or contract negotiations.
- 2.4.2 Team members must gain the proper approvals as outlined in Section 2.3 of this Policy if the gift or hospitality exceeds \$250.

## 2.5 Gifts Register

- 2.5.1 Each TSEG property is required to maintain a gifts register. The register is monitored by Group Compliance. Team members are required to enter all gifts received or offered to them, regardless of value on the gifts register.
- 2.5.2 The gifts registers are available in Protecht on the TSEG intranet. For further information contact Group Compliance.

## 2.6 Disposal of Gifts

- 2.6.1 Where a gift is not approved and cannot be returned to the person who gave it, it must be delivered to the Compliance Team in the TSEG property where it was received. The Compliance Team are responsible for determining the appropriate manner for disposing of or distributing these gifts.

# 03 Breaches of this Policy

TSEG is committed to conducting its operations in a way that meets its commitments to regulators, guests, and the wider community. Non-conformance with a policy, including this policy, can pose a significant risk to TSEG, guests, and the wider community, potentially resulting in punitive measures against TSEG.

Team members who become aware of an actual or possible breach of this policy must follow the established protocols set out in the Incident and Breach Management Policy. The Incident and Breach Management Policy has strict timelines in place to satisfy regulatory requirements; if a team member has reason to believe that a breach may have occurred it is imperative that those protocols are followed expeditiously to avoid adverse consequences.

Non-conformance with this policy may also amount to a breach of TSEG's Code of Conduct and values. Breaches of the Code of Conduct may result in disciplinary action, including termination of employment, fines, penalties, and potential prosecution.



## 04 Definitions

Term	Definition
<b>Contractor</b>	For the purposes of this policy, a contractor can be one of the following: <ul style="list-style-type: none"> <li>• Independent contractors: self-employed individuals or are part of a proprietary company (ABN) usually engaged for project work and paid for results achieved.</li> <li>• Contingent workers: individuals engaged to ensure coverage or support for TSEG roles. For example, a contingent worker is in a role that is vacant, whilst the position is being recruited.</li> <li>• Consultants: individuals engaged to deliver set outcomes, provide advice or recommendations, and are usually paid on completion of milestones or deliverables. Procurement is to be engaged when considering using consultants to agree the terms and conditions with TSEG.</li> </ul>
<b>Licensed Team Member</b>	Any team member who has been licensed through the Liquor & Gaming NSW (NSW) and/or Office of Liquor and Gaming Regulation (QLD).
<b>Team Member</b>	Means full-time, part-time and casual employee of TSEG
<b>TSEG</b>	The Star Entertainment Group

## 05 Relevant Legislation and Regulations

Document Title	Section
<b>Casino Control Act 1992 (NSW)</b>	Section 86 (2)(b)
<b>Casino Control Act 1982 (Qld)</b>	Section 65 (9)(b)

## 06 Related Policies and Documentation

The following policies and documentation related to this policy can be found on TSEG's intranet site.

- Anti-Bribery and Corruption Policy
- Code of Conduct
- Conflict of Interest Policy
- Procurement Policy
- Whistleblower Protection Policy
- Travel, Entertainment and Expenses Policy

## 07 Feedback and Questions

Please contact the Group Compliance team for any questions relating to this policy.